

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

<b>R. CATHY REARDON</b>	)	
<b>On behalf of herself and all</b>	)	
<b>similarly situated individuals,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>NO. 2:08cv1730MRH</b>
<b>v.</b>	)	
<b>CLOSETMAID CORPORATION</b>	)	<b>Hon. Mark R. Hornak</b>
	)	
<b>Defendant.</b>	)	
	)	<b>Class Action</b>
	)	

**JOINT MOTION TO ENLARGE CERTAIN DEADLINES IN THE  
NOVEMBER 13, 2013 FINAL PRE-TRIAL ORDER**

The Representative Plaintiff, by her undersigned counsel, along with the Defendant, by Counsel, hereby jointly move for enlargement of certain deadlines in the November 13, 2013, Pre-Trial Order to accommodate further settlement discussions and the Court's December 6, 2013, status phone conference. In support, Plaintiff states as follows:

1. On November 13, 2013, the Court (Judge Hornak) entered a Final Pre-Trial Order that scheduled a number of pre-trial matters culminating in a trial scheduled for January 6, 2014. Attached as Exhibit A [Docket 137].
2. On December 2, 2013, Judge Hornak issued an Opinion [Docket 157] and Order [Docket 158] pursuant to the following Motions; Plaintiff's Motion for Summary Judgment [Docket 90]; Defendant's Motion for Summary Judgment [Docket 94]; Defendant's Motion to Decertify the Pre-Adverse Action Sub-Class [Docket 98] and Plaintiff's Motion to Strike Declarations [Docket 108].
3. On December 2, 2013, the Court scheduled a Telephone Status Conference for

Friday, December 6, 2013 at 10:00 a.m.;

4. Pursuant to the November 13, 2013, Pre-Trial Order, the following deadlines are scheduled for Friday, December 6, 2013:

- a. Responses to Motions in Limine;
- b. Joint Exhibit List Chart (with columns) setting forth all trial exhibits, by exhibit number date, author, type of document, objection to this authenticity (if any) with response, and objection to admissibility with response.
- c. Designation of Discovery Excerpts to be offered at trial;
- d. Joint Proposed Jury Instructions and Verdict slips;
- e. Proposed Voir Dire;
- f. Joint Stipulations;

5. Based upon and in accordance with the Court's rulings on December 2, 2013, the Parties' counsel have conferred and are engaged in a mutual effort to withdraw, modify or streamline the pending Motions in Limine, proposed exhibits and other matters currently requiring response by December 6, 2013;

6. In the interest of efficiency and economy, the Parties respectfully request that the Court authorize the enlargement of time to file the Responses to the Motions in Limine, Joint Exhibit List, Designation of Discovery Excerpts, Joint Proposed Jury Instructions and Verdict Slips and Joint Stipulations. It is proposed that the dates in the November 13, 2013, Order be enlarged to at least December 10, 2013.

7. This deadline would still require the filing of these responses and other pleadings a calendar week before the schedule Final Pre-Trial Conference.

8. The Parties have also again begun discussions regarding the possibility of

alternatives means to dispose of the case.

Therefore, the parties respectfully request an Order enlarging deadlines in the November 13, 2013 Final Pre-Trial Order from December 6, 2013 to December 10, 2013 and grant the relief requested in the proposed Order attached hereto.

Respectfully submitted,

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